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May 27, 2020

**VIA ECF**

Hon. Debra C. Freeman  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Stanley Karol v. City of New York, et al., 18 CV 6467 (JGK) (DCF)

Your Honor:

On behalf of Plaintiff Stanley Karol and Defendant Eduardo Cautela in the above-entitled action, we submit this joint letter, pursuant to Section I(B) of Your Honor's Individual Practices, to request that the Court hold the current fact discovery deadline of May 29, 2020, as well as all interim deadlines, in abeyance for 30 days.<sup>1</sup> The parties are currently engaged in productive settlement discussions that may resolve this lawsuit without the need for further discovery. We agree to jointly update the Court within 30 days' time as to the status of those discussions. Thank you for your attention to this matter.

Respectfully submitted,

/s/ Karen B. Selvin

Karen B. Selvin  
*Counsel for Defendant*

/s/ Debra Greenberger

Debra Greenberger  
*Counsel for Plaintiff*

cc: Counsel of Record (via ECF)

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<sup>1</sup> This is a second request for an extension of the discovery deadline. On January 31, 2020, Judge Koeltl extended the fact discovery deadline from March 31, 2020 to May 29, 2020 (Dkt. No. 57). Subject to the Court's January 31, 2020 Order, the parties agreed to extend all interim discovery deadlines to May 29, 2020.